

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

**MARINA NIKOLAEVA and)
ANDREW DANKO,)
v.)
Plaintiffs,) Civil No. 2:21-cv-19977-SDW-JSA
SPARTA TOWNSHIP BOARD)
OF EDUCATION; NEW JERSEY) Judge: Susan D. Wigenton
DEPARTMENT OF)
EDUCATION; and KEVIN) Magistrate: Jessica S. Allen
DEHMER, Commissioner of)
Education, in his official capacity,)
Defendants.) MOTION DATE: August 18, 2025**

CERTIFICATION OF ROBERT C. THURSTON, ESQ.

I, Robert C. Thurston, Esq., declare and certify as follows:

1. I am an attorney at law, admitted to practice law before this Court, and am counsel of record for Respondents Robert Thurston and Thurston Law Offices [sic] in this matter.
2. I make this declaration based on my own personal knowledge and am competent to testify to all of the facts contained herein if called upon to do so.
3. Throughout my participation in this matter on behalf of Plaintiffs Marina Nikolaeva (“Marina”) and Andrew Danko (“Andrew”) (collectively “Plaintiffs”), I developed and continued to have an excellent working relationship with them. At no point did either Marina or Andrew indicate that they were

displeased with my services or agreed with the adversity that John Rue (“Rue”) created. In fact, I discussed with Marina and Andrew every proposed legal action or filing I made on their behalf and they repeatedly indicated they were very satisfied with my representation. It is notable that neither Marina nor Andrew has filed an affidavit in support of Rue’s motion.

4. A true and correct copy of Certificate of Good Standing of Thurston Law Offices LLC is attached hereto as Exhibit A.

5. True and correct copies of Respondents’ briefs on appellate jurisdiction are attached hereto as Exhibit B.

6. A true and correct copy of the Order denying Rue’s Rule 60 Motion to oust Class Counsel in the C.P. Class Action is attached hereto as Exhibit C.

7. True and correct copies of communications between Filomena Laforgia and Rue are attached hereto as Exhibit D. I received these directly from Ms. Laforgia via my website submission form and via email.

8. I am knowledgeable about several other attorneys¹ that were either employees of Rue or worked under contracts with similar to that of Respondents who have not been paid for their services. At least one of those attorneys has filed

¹ The identities of these attorneys are being withheld to protect their interests.

a wage claim against Rue for up to \$50,000.00 with the New Jersey Department of Labor & Workforce Development.

9. A true and correct copy of Rue's letter dated July 15, 2025 threatening to intervene in the matter captioned *J.A., et al. v. New Jersey Department of Education*, Civil No. 1:18-cv-9580 is attached hereto as Exhibit E.

10. Rue moved to Florida several years ago and now resides in Louisville, Kentucky with his wife Krista Haley Rue. A true and correct copy of Krista Haley Rue's Instagram profile page excerpt is attached hereto as Exhibit F.

11. A true and correct business status report of John Rue & Associates, LLC, dated July 26, 2025 is attached hereto as Exhibit G.

12. A true and correct excerpted copy of the Sparta Township Board of Education Meeting Minutes from June 12, 2025 are attached hereto as Exhibit H.

13. Thurston Law Offices LLC is owed substantial attorney's fees and costs – in excess of \$180,000 – as reimbursement for representing Plaintiffs in the related cases in which they were prevailing parties. Upon information and belief, Rue has recovered those fees and costs, but has to date paid Thurston Law Offices LLC nothing.

14. A true and correct copy of Rue's email to me dated July 23, 2025 is attached hereto as Exhibit I.

15. True and correct copies of Rue's communications to the New Jersey Attorney General's Criminal Division dated November 2, 2024 and March 12, 2025 are attached hereto as Exhibit J.

Dated: July 29, 2025

By: /s/ Robert C. Thurston
Robert C. Thurston